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Attorney for Defendant DoorDash, Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

OMNITY CONSULTING, LLC d/b/a HARLEM SHAKE (WEST 124TH STREET), individually and on behalf of all others similarly situated.,

Plaintiff,

V.

## DOORDASH, INC., ,

Defendant.

Case No. 4:24-cv-00959-JSW

**SECOND STIPULATION TO EXTEND  
TIME TO RESPOND TO COMPLAINT**

Complaint Filed: February 16, 2024

1 Pursuant to Local Rule 6-1(a), the parties, Plaintiff Omnity Consulting, LLC d/b/a Harlem Shake  
2 (West 124<sup>th</sup> Street) (“Omnity”) and Defendant DoorDash, Inc. (“DoorDash”), by and through their  
3 respective counsel, stipulate to extend the time for DoorDash to respond to the Complaint. The parties  
4 state as follows:

5 1. On February 16, 2024, Omnity filed this action, bringing claims under the Administrative  
6 Code of City of New York § 20-563.3, New York Local Law No. 52 of 2020, and New York Local No.  
7 88 of 2020;

8 2. On February 20, 2020, DoorDash registered agent received a Service of Process with a  
9 copy of the summons and complaint, making March 12, 2024, the previous deadline for DoorDash to  
10 answer or otherwise respond to the complaint;

11 3. On March 11, 2024, the parties filed a Joint Stipulation extending DoorDash’s time to  
12 respond to Plaintiff’s Complaint. The justification for said stipulation was to allow DoorDash more time  
13 to evaluate the claims raised in the complaint.

14 4. The parties have presently conferred and agree to further extend the time for DoorDash to  
15 answer or otherwise respond to the Complaint by 30 days, from the current deadline of April 9, 2024, to  
16 May 8, 2024.

17 5. The parties have engaged in settlement discussions during the previous extension period  
18 and the granting of this further extension would allow the parties to continue to do so.

19 6. One prior extension of time has been requested, on March 11, 2024;

20 7. The parties will file the joint Rule 26(f) report and initial disclosures by their respective  
21 deadlines.

22 8. This change will not alter the date of any other event or deadline already fixed by Court  
23 order.

24 9. The filing of this stipulation does not waive any defenses, objections, or bases for  
25 dismissal of either party.

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1 THEREFORE, IT IS HEREBY STIPULATED by and between Omnity and DoorDash that  
2 DoorDash will have until May 8, 2024, to respond to the Complaint.

3 **SO STIPULATED**

4 Dated: April 3, 2024

*s/ Connor J. Dopeso*

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10 Attorney for Plaintiff Omnity Consulting, LLC  
11 d/b/a Harlem Shake (West 124th Street) and the  
12 Class

13 Dated: April 3, 2024

*s/ Jenelle Welling*

14 Jenelle Welling (SBN 209480)  
15 ROSSI DOMINGUE, LLP  
16 3201 Danville Blvd., Suite 172  
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19 Email: jenelle@rdlaw.net

20 Attorney for Plaintiff Omnity Consulting, LLC  
21 d/b/a Harlem Shake (West 124th Street) and the  
22 Class

23 **SIGNATURE ATTESTATION**

24 In accordance with Local Rule 5-1(i)(3), I, Connor J. Dopeso, attest that I have obtained  
25 concurrence in the filing of this document from the other signatory listed above.

26 */s/ Connor J. Dopeso*

27 Connor J. Dopeso

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on April 4, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send notification of such filing to all counsel of record in this matter who are registered on the CM/ECF system.

/s/ Connor J. Dopeso  
Connor J. Dopeso